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February 9, 2021

VIA ECF

Hon. Edward S. Kiel, U.S.M.J.
U.S. District Court, District of New Jersey
U.S. Post Office & Courthouse Bldg.
2 Federal Square, Courtroom 8
Newark, New Jersey 07102

Re: Eugene Scalia v. Ernie's Auto Detailing, Inc. *et al.*
Civil Action No: 2:20-cv-17785-KM-ESK

Dear Judge Kiel:

As you are aware, this firm represents Defendants Ernie's Auto Detailing, Inc., and Ernesto Decena ("Defendants"), in this matter. We write to respectfully request a brief adjournment and rescheduling of the Initial Scheduling Conference with the Court, scheduled for Thursday, February 11, 2021, at 11:00 A.M. (See D.E. No. 9). Undersigned counsel Mr. Tripp is scheduled to give a legal presentation at that time.¹ Plaintiff consents to this request.

In terms of availability, we have conferred with counsel for the Plaintiff Secretary of Labor, and counsel for the parties could participate in the Initial Scheduling Conference on Thursday between 12:30 P.M. and 2 P.M., or on Friday, February 12, 2021, between 10:30 A.M. and 1:30 P.M. If Your Honor is unavailable at these times, we respectfully request that the Court schedule the Initial Scheduling Conference on or after Monday, February 22, 2021, as counsel for Plaintiff is out of the office next week.

¹ Counsel apologizes for not identifying and communicating this issue sooner – the association in question rescheduled the presentation from its original date and time to February 11.

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We thank Your Honor for the Court's attention to and consideration of this matter.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Joshua D. Allen

Joshua D. Allen, Esq.

Noel P. Tripp, Esq. (pro hac vice *pending*)

JDA/NPT:jg

cc: Amy Tai, Esq. (via ECF)
Jaime Sanchez, Esq. (via email)